

DATE: Thursday, December 26, 2013

TO: County Welfare Department Supplemental Nutrition Assistance Program-Education (SNAP-Ed) (Get Fresh) Project Directors
Local Health Department (LHD) SNAP-Ed Project Directors
University of California, SNAP-Ed "CalFresh Nutrition Education"
Program Managers and Advisors
Area Agency on Aging SNAP-Ed Project Directors
California Department of Food and Agriculture (CDFA) Project Directors

FROM: Kristin Brinks, Chief
CalFresh Nutrition Education and Outreach Bureau
California Department of Social Services

John Talarico, DO, MPH, Chief
Nutrition Education and Obesity Prevention Branch
California Department of Public Health

David Ginsburg, MPH, Director
University of California CalFresh Nutrition Education Program
University of California at Davis

Andrea Bricker, MS, RD, Project Coordinator
SNAP-Ed Projects
California Department of Aging

Diana Paluszak, Intervention Coordinator
Division of Fairs and Expositions
California Department of Food and Agriculture

SUBJECT: Clarification on Site Duplication

We are writing to relay written communication received from our United States Department of Agriculture (USDA) project officer, Andy Riesenberg, Team Leader Food Security and Obesity Prevention USDA Western Region Office (WRO) regarding clarification of the WRO site duplication policy. Numerous questions have been raised seeking clarification on the provision of direct services by multiple local SNAP-Ed funded projects at the same site. The written communication was a follow-up to verbal explanations provided by Mr. Riesenberg at CDPH's recent LHD Directors' Meeting on November 21-22, 2013. All the above listed state level implementing agency leads were present and requested that this information be conveyed in writing. Please see guidance provided below (*italics*) with additional framing in **bold** print.

Background information provided from WRO:

The purpose of the Food and Nutrition Service (FNS), WRO, Supplemental Nutrition Assistance Program policy on utilization of sites by more than one FNS USDA SNAP-Ed funded entity is to ensure the efficient and effective use of federal funds to achieve program objectives. FNS wants to avoid duplication of services, both between FNS-funded programs, i.e., SNAP-Ed, Women, Infants and Children (WIC) and also between two or more entities funded by the same FNS program. California has multiple agencies receiving SNAP-Ed funding, so it is important that services are coordinated and complementary.

Prior to the implementation of the Healthy, Hunger-free Kids Act of 2010, this policy was interpreted as meaning not more than one SNAP-Ed funded projects can operate at the same site at all. FNS recognized areas of the State with no SNAP-Ed services and felt it was inefficient that two agencies would be at the same site when there was still unmet need. With the change to a grant program that is not dependent on cost share and the implementation of a state-wide SNAP-Ed delivery strategy, concerns about State Share or reach become less important than delivering effective strategies to change eating and physical activity behavior in the SNAP-Ed eligible population.

Shift from prior guidance on selection of sites:

Using the Socio-Ecological Model (SEM), where different agencies may employ a variety of strategies for the SEM, and where one, high-priority site might benefit from coordinated and complementary strategies, the parameters for duplication change. With the expanded focus on implementing comprehensive, evidence-based programs, FNS expects that local SNAP-Ed agencies will deliver more intensive services with a mix of strategies, including direct education, indirect education, social marketing, policy, environmental, or systems changes. FNS is looking for agencies to adopt 'whole site' or 'whole neighborhood' approaches that will leave a lasting impact on current and future children and families in low-income places. This requires a comprehensive approach.

Example and exceptions related to Direct Education:

If the State Plan identifies one agency as implementing one strategy, it may work for another SNAP-Ed funded agency to implement a different strategy in the same location. However, the exception is direct education in a classroom format. Because direct education is a single strategy, and SNAP-Ed agencies are required to track and report unduplicated participants and contacts in the Education and Administrative Reporting System (EARS) form, FNS cannot allow two different agencies to provide direct education to the same audience (e.g., children) at the same physical site in the same year. FNS cannot have two agencies taking credit for unduplicated participant reach at the same location. However, it is important to think beyond reach and instead work collaboratively to provide complementary strategies that will achieve greater outcomes and impact than a single strategy alone.

Parameters and guidance for policy on selection of sites:

In order to work, the policy must meet these parameters:

- 1) The approved State Plan for the State Agency incorporates comprehensive strategies, including a description of how the implementing agencies will complement each other in achieving the stated goals for the strategies; &*
- 2) The planning process leads to the approved State Plan and identifies the nutrition education, food security and obesity prevention needs in the jurisdiction, develops common goals and identifies which entities will carry out each type of activity/intervention at which service site.*

Implications of policy on an integrated work plan:

FNS' expectation is that SNAP-Ed funded programs utilize the County Nutrition Action Partnership (CNAP) or other collaborative meetings to develop an integrated plan that incorporates which sites will be utilized by each agency and how the combined set of interventions provided by all programs and projects will further the objectives of the plan.

We hope that the additional clarification and guidance provided by Mr. Riesenberg will be helpful as local SNAP-Ed agencies work together to improve the operation of the SNAP-Ed Program for low-income residents of California.